UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION

**UNITED STATES OF AMERICA** 

**CASE NO: 25-CR-20142** 

v.

CARLOS RODRIGUEZ MELENDEZ, Defendant.

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## UNOPPOSED DEFENDANT'S MOTION FOR CONTINUANCE OF TRIAL

**COMES NOW,** Defendant, **Carlos Rodriguez Melendez**, by and through undersigned counsel, pursuant to United States Southern District Local Rule 7.6, hereby requests that this Honorable Court enter an Order continuing the above referenced matter, and in support thereof, would state:

- 1. Defendant has calendar call set May 13, 2025, with a trial date for May 19, 2025.
- 2. Undersigned and AUSA Lindsey Friedman have been working diligently on this case and the Government has disclosed that they will be providing voluminous discovery on May 2, 2025. Undersigned and Defendant have not had the opportunity to review any discovery to date.
- 3. Undersigned has spoken with AUSA Lindsey Friedman and the Government is unopposed to the continuance and is requesting that the trial date be reset for sixty (60) days.
- 4. This motion is not intended to cause any undue hardship or cause any delay to this Honorable Court's proceedings.

5.

Page 1 of 3

**WHEREFORE**, Defendant respectfully request that this Honorable Court continue the above-referenced trial.

## Respectfully submitted,

/s/ Nayib Hassan

Nayib Hassan, Esq., (Fla Bar No. 20949)
Attorney for Defendant
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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 2<sup>nd</sup> day of May 2025, the undersigned electronically filed the foregoing document, Unopposed Defendant's Motion for Continuance, with the Clerk of the Court using CM/ECF.

/s/ Nayib Hassan

Nayib Hassan, Esq., (Fla Bar No. 20949) Attorney for Defendant